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May 19, 2023

**VIA ECF**

Chambers of Hon. Robert B. Kugler  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th and Cooper Streets  
Camden, New Jersey 08101

Special Master the Honorable Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18th Floor  
Philadelphia, PA 19103

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation***  
***United States District Court for the District of New Jersey, Case No.: 1:19-md-2875***

Dear Judge Kugler and Special Master Vanaskie:

On behalf of Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., Actavis LLC, Torrent Pharmaceuticals Ltd., Torrent Pharma Inc., Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC (collectively, "Defendants"), please find enclosed a proposed order modifying the deadline for Defendants to submit their response to the class notice program as discussed on the record at the Biweekly Discovery Conference held on May 17, 2023, before Special Master Vanaskie.

Thank you once again for your consideration of these issues.

Respectfully submitted,

/s/ Steven M. Harkins

Steven M. Harkins

Enclosure

Cc: Defendants' Executive Committee via [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)  
Plaintiffs' Executive Committee via [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)